

REMARKS

A review of the claims indicates that:

- A) Claims 2—16, 33—39 and 58—71 remain in their original form.
- B) Claims 17—31, 40—55 and 72—85 are withdrawn.
- C) Claims 1, 32, 56 and 57 are currently amended.

In view of the following remarks, Applicant respectfully requests allowance of the non-withdrawn claims.

Claim Objections

The Applicant has amended several claims in accordance with the Patent Office's suggestions.

Traversal of the §103 Rejections

Claims 1—6, 9, 10, 32—36, 38, 39 and 56—65 stand rejected under 35 U.S.C. §103(a) as being unpatentable over US 2003/0105980, hereinafter "Challenger" in view of U.S. Pat. No. 7,205883, hereinafter "Bailey." In response, the Applicant respectfully traverses the rejection.

Claim 1 recites a method comprising:

- creating a data structure including a plurality of user id-user key pairs, each user id-user key pair comprising a user id associated with one of a plurality of users and a user key **comprising a master key and a keyed-hash message authentication code** encrypted using a password associated with the one of the plurality of users; and
- delivering the data structure to one or more of the plurality of users.

Claim 1 has been amended to recite that the user key comprises "a master key and a keyed-hash message authentication code". Claim 1 in its original

1 condition recited that the user key comprised "a master key." Additionally, Claim
2 10, now cancelled, originally recited the restriction that the user key included the
3 "keyed-hash message authentication code". Claim 1 as amended combines these
4 recitations. The Applicant respectfully submits that the prior art of record does not
5 teach or suggest encryption of a user key comprising a master key and a keyed-
6 hash message authentication code, as recited.

7 Claim 1 recites that the user key is an encryption of the master key and the
8 HMAC (keyed-hash message authentication code, see Applicant's specification at
9 page 14, line 19 and other locations). Thus, two elements are combined to form
10 the user key. The prior art fails to teach or suggest such a combination.

11 The Patent Office supported the Section 103 rejection of Claims 1 and 10
12 using sections of the Challenger and Bailey references. In response, the Applicant
13 will discuss both references. The Bailey reference was not cited by the Patent
14 Office as teaching a user key comprising a master key and a keyed-hash message
15 authentication code. The Applicant concurs that Bailey fails to teach these
16 aspects, as recited. In view of the discussion below, the Applicant submits that the
17 Challenger reference fails to remedy the deficiency of Bailey.

18 At paragraph [0019], Challenger teaches that a signed phrase can be created
19 with a private key of a public/private key pair. The signed phrase can then be
20 loaded into a table similar to Challenger's table 100 in FIG. 1. The phrase can be
21 any text or string. Thus, Challenger teaches association of a user ID and a signed
22 string. In operation, Challenger teaches (block 414 at FIG. 4) that the phrase (text
23 or string) is signed by the security chip and compared to the table. If there is a
24 match, then the remote user is granted access. Thus, Challenger teaches that a
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1 signed phrase (allegedly an authentication code) can be associated with a user ID
2 (but not a user key, as recited). Thus, Challenger fails to teach or suggest that an
3 authentication code can be associated with a user key. That is, Challenger fails to
4 teach or suggest a user key comprising a master key and an authentication code.
5 In particular, Challenger does not teach or suggest a user key comprising a master
6 key and a keyed-hash message authentication code that are encrypted using a
7 password.

8 The Patent Office suggests that Challenger teaches a keyed-hash message
9 authentication code at paragraph [0019]. The Applicant respectfully disagrees that
10 [0019] actually teaches a user key comprising (a master key and) a keyed-hash
11 message authentication code. Instead, the Applicant respectfully submits that
12 Challenger teaches an association between a *user ID* and an authentication code,
13 and not a *user key* comprising an authentication code.

14 In particular, the Applicant submits that Challenger fails to teach or suggest,
15 “a user key comprising a master key and a keyed-hash message authentication
16 code” as recited. That is, Challenger fails to teach or suggest a user key that
17 comprises two things, wherein the two things are then encrypted, as recited by
18 Claim 1.

19 Referring to Challenger at [0019], Challenger teaches that a table similar to
20 table 100 in FIG. 1 of Challenger could be constructed, wherein the entries would
21 include user IDs and signed phrases. Thus, Challenger teaches an association
22 between a user ID and an authentication code. No teaching of a user key
23 comprising a master key and an authentication code is taught. Instead, Challenger
24 teaches association of an authentication code and a user ID, not “a user key
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1 comprising a master key and a keyed-hash message authentication code” as recited
2 by Claim 1.

3 The Applicant respectfully submits that Claim 1 recites elements not taught
4 or suggested by Challener and Bailey, and requests that the Section 103 rejection
5 be removed.

6 **Claims 2—9 and 11—16** depend from Claim 1 and are allowable as
7 depending from an allowable base claim. These claims are also allowable for their
8 own recited features that, in combination with those recited in Claim 1, are neither
9 disclosed nor suggested in references of record, either singly or in combination
10 with one another. Accordingly, the Applicant respectfully requests that the
11 Section 103 rejection of these claims be removed.

12 **Claims 32, 56 and 57** are allowable for at least the reasons that Claim 1 is
13 allowable. These claims have been amended in a manner consistent with original
14 Claims 10, 39 and 65 to recite, “a user key comprising a master key and a keyed-
15 hash message authentication code encrypted using a password associated with the
16 one of the plurality of users.” or similar. Accordingly, the Applicant respectfully
17 requests that the Section 103 rejection of these claims be removed.

18 **Claims 33—38 and 58—71** depend from Claims and 32 and 57, and are
19 allowable as depending from an allowable base claim. These claims are also
20 allowable for their own recited features that, in combination with those recited in
21 Claims 32 and 57, are neither disclosed nor suggested in references of record,
22 either singly or in combination with one another. Accordingly, the Applicant
23 respectfully requests that the Section 103 rejection of these claims be removed.

24 **Conclusion**

1 The Applicant submits that all of the claims are in condition for allowance
2 and respectfully requests that a Notice of Allowability be issued. If the Office's
3 next anticipated action is not the issuance of a Notice of Allowability, the
4 Applicant respectfully requests that the undersigned attorney be contacted for the
5 purpose of scheduling an interview.

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7 Respectfully Submitted,

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